

TICKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MILLER
TO INTERROGATORIES OF
THE NEWSPAPER ASSOCIATION OF AMERICA
AND MOTION FOR LATE ACCEPTANCE
(NAA/USPS-T23-1 - 2)**

The United States Postal Service hereby files the responses of witness Miller to the following interrogatories of the Newspaper Association of America, dated August 15, 1997: NAA/USPS-T23-1 and 2.

Each interrogatory is stated verbatim and is followed by the response.

These responses were due to have been filed on August 29, 1997. Final drafts were reviewed and prepared in order to accommodate a timely filing; however, the Postal Service has no record of having ever filed them. Although the Postal Service can offer no precise explanation, undersigned counsel believes it appropriate to assume personal responsibility for this failure.

Counsel regrets this apparent oversight and apologizes for any inconvenience it may have caused. To mitigate, in some small way, any harm caused, counsel sent facsimile copies to NAA counsel yesterday.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER TO
INTERROGATORIES OF NEWSPAPER ASSOCIATION OF AMERICA**

NAA/USPS-T23-1. Please confirm that your calculation of mail processing cost avoidance for Qualified Business Reply Mail (QBRM) and Prepaid Reply Mail (PRM) of 4.016 cents is a single estimate that applies equally to both types of mail, rather than an average of two different estimates of costs avoided. If you cannot confirm, please explain.

RESPONSE:

Confirmed.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER TO
INTERROGATORIES OF NEWSPAPER ASSOCIATION OF AMERICA**

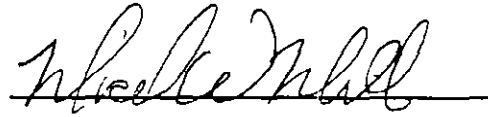
NAA/USPS-T23-2. Is there any reason that the mail processing costs avoided by QBRM and by PRM would differ?

RESPONSE:

The mail processing cost avoidance measured by my testimony is equally applicable to QBRM and PRM.

DECLARATION

I, Michael W. Miller, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A handwritten signature in cursive script, appearing to read "Michael W. Miller", written over a horizontal line.

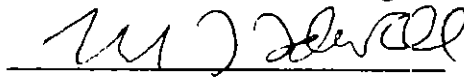
Dated: 10/1/97

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

A handwritten signature in black ink, appearing to read "Michael T. Tidwell", written over a horizontal line.

Michael T. Tidwell

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October 2, 1997